UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY

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(Admissions *pro hac vice* pending)

PROPOSED ATTORNEYS FOR DEBTOR

In re:

LTL MANAGEMENT LLC,1

Debtor.

Chapter 11

Case No.: 23-12825 (MBK)

Judge: Hon. Michael B. Kaplan

APPLICATION TO ADMIT BRAD B. ERENS PRO HAC VICE

TO: PARTIES ON THE COURT'S ELECTRONIC MAIL NOTICE LIST

PLEASE TAKE NOTICE that pursuant to Rule 2090-1 of the District of New Jersey Local Bankruptcy Rules, Wollmuth Maher & Deutsch LLP, proposed co-counsel for Debtor, LTL Management LLC (the "Debtor"), hereby makes the application before the United States Bankruptcy Court for the District of New Jersey, for the entry of an Order admitting Brad B. Erens of the law firm Jones Day *pro hac vice* in the within proceeding to represent the Debtor.

The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

The undersigned relies upon the Certifications of Paul R. DeFilippo and Brad B. Erens in support of this application.

The undersigned hereby requests that, in accordance with D.N.J. LBR 2090-1, if no objection to the within application is filed within seven (7) days, the application be granted and the proposed form of Order be entered.

Dated: April 4, 2023

New York, New York

Respectfully submitted,

WOLLMUTH MAHER & DEUTSCH LLP

/s/ Paul R. DeFilippo

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Proposed Co-Counsel for LTL Management LLC